

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

Joshua Winer,

Plaintiff,

V.

) Civil Action Case No.

Umaymah Mohammad, AJP Educational ) 1:25-cv-02329-TWT

Foundation, Inc. A/K/A American Muslims )

For Palestine, WESPAC Foundation, Inc., )

Sean Eren as the representative of National )

Students for Justice in Palestine, Doctors )

Against Genocide Society, Cair-Nga Inc. )

A/K/A/ CAIR-Georgia, CAIR Foundation )

Inc., A/K/A Council on Islamic Relations )

or CAIR, Rupa Marya, Ibrahim Jouja as )

representative of Emory Students for \_\_\_\_\_)

Justice in Palestine, )

Defendants.

**PLAINTIFF JOSHUA WINER’S MOTION REQUESTING ACCEPTANCE  
OF LATE FILING**

Plaintiff respectfully moves this Court to accept his brief in opposition to Defendant Cair-Nga Inc.'s motion to dismiss his first amended complaint, which was entered into the Court's ECF system exactly one minute past the filing deadline. A record of the submission, which includes a time-stamp, is attached

hereto as Exhibit A and provides: “the following transaction was entered by Israelovitch, Lauren on 7/22/2025 at 0:00 AM EDT and filed on 7/22/2025.”

The brief was fully prepared and ready for submission prior to the deadline. However, due to an unexpected and momentary technical issue, final submission occurred one minute late. No prejudice has resulted from this brief delay, and the filing was otherwise compliant in all respects.

Accordingly, Plaintiff respectfully requests that the Court excuse the delay and deem the submission timely filed.

Respectfully submitted,

**National Jewish Advocacy Center, Inc.**

By: /s/ Lauren Israelovitch

Lauren Israelovitch\*  
3 Times Square  
New York, NY 10036  
(914) 222-3828  
lauren@njaclaw.org  
\*Admitted pro hac vice

**Weissmann Zucker Euster + Katz P.C.**

By: /s/ David F. Katz

DAVID F. KATZ  
The Fountains at Piedmont Center  
Building 11, Suite 950  
3495 Piedmont Road  
Atlanta, Georgia 30305  
T. 404-390-2941  
dkatz@wzlegal.com  
GA Bar No. 408738

*Attorneys for Plaintiff Joshua Winer*

**CERTIFICATE OF COMPLIANCE WITH L.R. 5.1**

WE HEREBY CERTIFY that (i) the foregoing document and (ii) Plaintiff Joshua Winer's brief in opposition to Defendant's Cair-Nga Inc.'s motion to dismiss Plaintiff's first amended complaint was prepared in Times New Roman, 14-point font, as approved by Local Rule 5.1.

**National Jewish Advocacy Center, Inc.**

By: /s/ *Lauren Israelovitch*

Lauren Israelovitch\*

3 Times Square

New York, NY 10036

(914) 222-3828

lauren@njaclaw.org

\*Admitted pro hac vice

**Weissmann Zucker Euster + Katz P.C.**

By: /s/ *David F. Katz*

DAVID F. KATZ

The Fountains at Piedmont Center

Building 11, Suite 950

3495 Piedmont Road

Atlanta, Georgia 30305

T. 404-390-2941

dkatz@wzlegal.com

GA Bar No. 408738

*Attorneys for Plaintiff Joshua Winer*